APPLICATION FOR AN EXTENSION OF TIME

1 [PROPOSED] ORDER 2 3 WHEREAS the current date to respond to the Complaint in the above-4 captioned matter is June 24, 2011; 5 WHEREAS, plaintiff Vivine H. Wang has opposed a transfer of this 6 7 matter to the multidistrict litigation pending in the United States District Court for the Southern District of New York entitled *In re: The Bear Stearns Companies Inc.* 8 9 Securities, Derivative and Employee Retirement Income Security Act (ERISA) Litigation, MDL No. 1963 (the "Bear Stearns MDL Litigation") for coordinated or 10 consolidated pretrial proceedings; 11 12 13 WHEREAS, the Panel for the Bear Stearns MDL Litigation has not yet 14 ruled on whether this matter should be transferred; 15 16 WHEREAS, good cause exists to grant defendants The Bear Stearns Companies LLC, J.P. Morgan Securities LLC, J.P. Morgan Clearing Corp., Deloitte 17 & Touche LLP, Alan D. Schwartz, Alan C. Greenberg, Joe Yi Zhou, and Garrett 18 Bland (collectively, "Defendants") an extension of time to answer, move against, or 19 20 otherwise respond to the Complaint to and until the earlier of the following: (1) September 22, 2011; or (2) thirty (30) days after a decision by the MDL Panel not 21 22 to transfer this case to the Bear Stearns MDL Litigation; 23 24 25 26 27 28

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